

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

IN RE: § CASE NO: 23-70045  
Jose Raul Galvan §  
Nancy Veronica Galvan §  
Debtor(s) § CHAPTER 13

DEBTORS' RESPONSE TO TRUSTEE'S OBJECTION TO CONFIRMATION OF CHAPTER 13  
PLAN AND MOTION TO DISMISS OR CONVERT  
(Relates to Doc. 36)

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

NOW COMES, Jose Raul Galvan and Nancy Veronica Galvan, Debtor(s), file this Response to Trustee's Objection To Confirmation Of Chapter 13 Plan And Motion To Dismiss Or Convert ("Motion") and Request for Hearing and would show the following:

1. The Chapter 13 Trustee filed a Motion styled "Trustee's Objection To Confirmation Of Chapter 13 Plan And Motion To Dismiss Or Convert" on July 7, 2023 [Doc. 36] on the pending case.
2. The Debtors admit the allegations contained in paragraphs 1, 2, and 3 of the Trustee's Motion To Dismiss. The Debtors will show they have filed all necessary amendments to cure all deficiencies.

WHEREFORE ALL PREMISES, CONSIDERED, Jose Raul Galvan and Nancy Veronica Galvan, pray this Court deny the motion, and a hearing be set on the matter at the next McAllen docket; and that it grant any other and further relief which the Debtor(s) may show themselves justly entitled to receive at law or in equity.

Date: August 10, 2023,

Respectfully Submitted,

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By: /s/ Marcos D. Oliva  
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ATTORNEY FOR DEBTOR(s)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Debtors' response to the Trustee's Motion to Dismiss was served on August 10, 2023. Service was accomplished by the method and to the following as indicated: BY ELECTRONIC NOTICE OR REGULAR FIRST CLASS MAIL, POSTAGE PREPAID:

/s/ Marcos D. Oliva

**CHAPTER 13 TRUSTEE:**

Yvonne V. Valdez  
555 N. Carancahua Ste. 600  
Corpus Christi, Texas 78401

**U.S. TRUSTEE:**

606 N. Carancahua, Ste. 1107  
Corpus Christi, Texas 78401

**DEBTOR(s):**

Jose Raul Galvan and Nancy Veronica Galvan  
5023 Elk Lane  
Edinburg, TX 78539